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July 21, 2008

Morrie Lewis
Air Quality Permit Analyst
Idaho Department of Environmental Quality
1410 North Hilton
Boise, Idaho 83706-1255

RECEIVED
JUL 22 2008
Department of Environmental Quality
State Air Program

RE: Frazier Industrial Company Permit No. P-2008.0084 Modification Application

Dear Mr. Lewis:

On behalf of Frazier Industrial Company (Frazier), JBR Environmental Consultants, Inc. (JBR) is submitting a permit modification application. Frazier is proposing to modify their existing permit to increase annual paint throughput limits to provide more operating flexibility. The annual paint usage limits proposed in this application are listed below:

Orange: 19,000 gal/yr
Aromatic: 9,300 gal/yr
Blue: 17,000 gal/yr
Yellow: 2,310 gallons of existing Trin-Kote Yellow or 4,000 gal/yr Sheboygan Yellow

If you have any questions or need additional information feel free to contact myself at 208.853.0883 or Richard Peake at 843.326.1477 ext. 106.

Respectfully Submitted,

Melissa Armer, PE
JBR Environmental Consultants

cc: Richard Peake, Industrial Engineer, Frazier Industrial Company

Permit Modification Application

Permit No. P-2008.0084

Frazier Industrial Company

Prepared for:
Frazier Industrial Company
3770 Poleline Road
Pocatello, ID 83201

Prepared by:
JBR Environmental Consultants, Inc.
7669 West Riverside Drive, Suite 101
Boise, ID 83714

July 2008

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1.0 PROCESS DESCRIPTION

Frazier Industrial Company manufactures structural steel storage systems. At the Pocatello facility steel is delivered to the facility and is then cut and welded into product components. The type of welding conducted at the facility is metal inert gas welding with a carbon steel ER70S-3 electrode. The welded steel components are then bundled and prepared to be coated with paint.

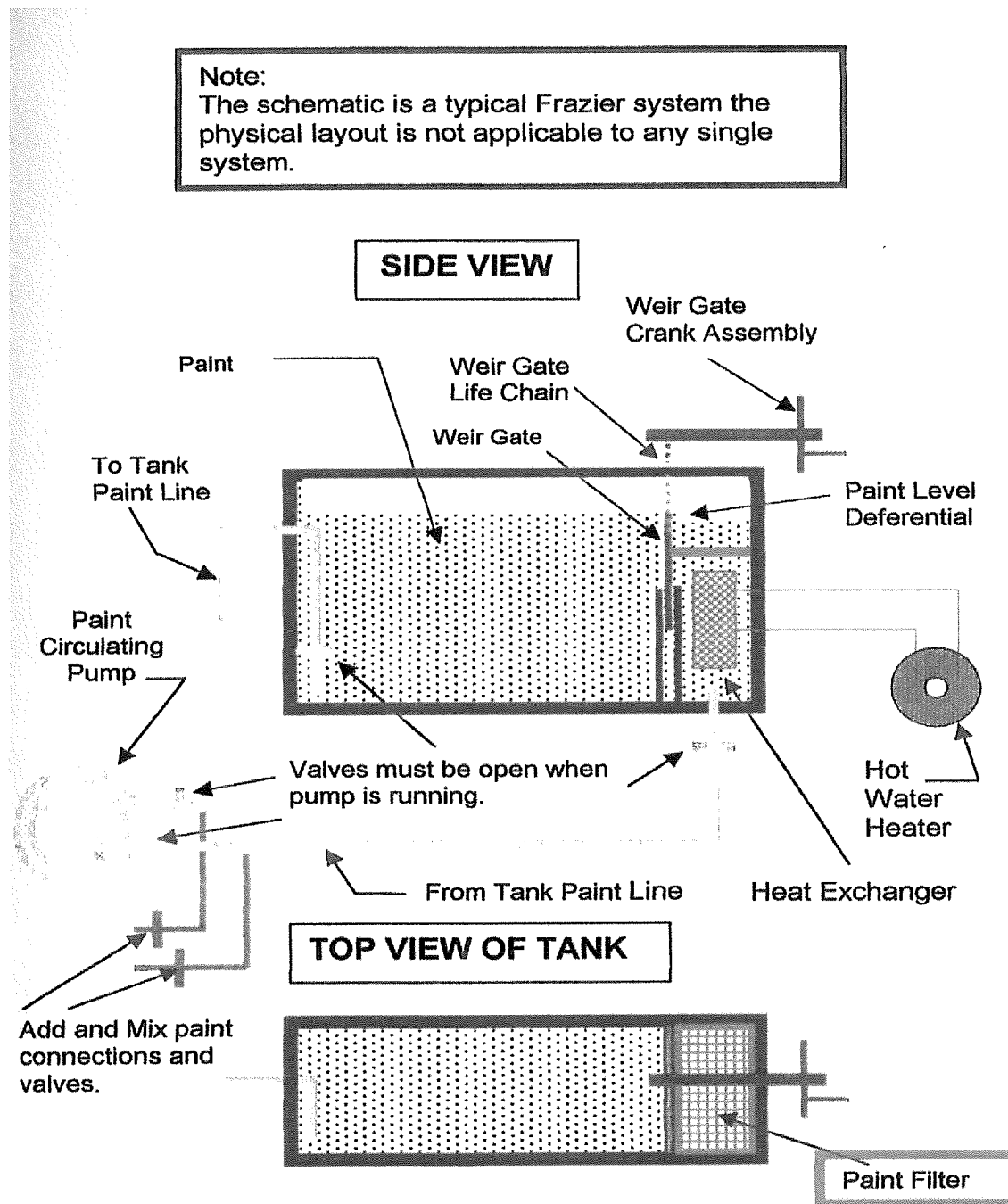
The steel components are coated using a dip tank paint system consisting of three large rectangular steel tanks used to contain the paint. Tank 1 (1,300 gal) and Tank 2 (1,650 gal) typically contain orange paint and Tank 3 (4,800 gal) contains blue paint. Frazier also has the capability of coating its steel components with yellow paint. The yellow paint is used less frequently than the orange and blue paint and based on customer demand. The yellow paint is placed in Tank 2 after the orange paint has been fully cleaned out. Frazier has used Trin-Kote yellow paint in the past, but plans to switch to a lower VOC Sheboygan yellow paint once the existing Trin-Kote inventory is used. Currently Frazier has approximately 2,310 gallons of Trin-Kote yellow paint and thereafter is requesting 4,000 gallons per year limit for the Sheboygan yellow paint.

Each dip tank system is internally fabricated. The dip tank system is capable of keeping the paint mixed, filtered and within a predetermined temperature. Figure 1 below shows the dip tank configuration.

Aromatic 100 solvent is stored in 330 gallon metal mobile storage totes. The solvent is added to the dip tanks to obtain the desired paint viscosity. The solvent is also occasionally used to clean paint from rollers, scrapers and other tools used in the painting operation. The solvent that is used for cleaning is recycled back into the process by being mixed in the dip tanks when needed. The orange, blue, and yellow paint is also stored in metal mobile totes prior to being placed in the dip tanks. Each storage tote is approximately 330 gallons and the lid is closed when not in use. The dip tank is open when steel is being dipped and is closed when not in use. The facility utilizes a wall exhaust fan to provide building ventilation. The exhaust fan does not control emissions from the building.

Steel components are typically dipped and kept in the dip tank for a minimum of two minutes. Once the steel components are coated they are hoisted out of the tank and allowed to drain for approximately 25 minutes. Next, a nap paint roller is used to smooth out any excess paint and coat unpainted surfaces. The painted steel components are then sent to the storage area where the finished product is stored until it is shipped to the customer.

Figure 1- Dip Tank Configuration



1.1 Equipment List

Included in Appendix B is a scaled plot plan which identifies all equipment that is requested to be included in the PTC permit. Included in Appendix C are the PTC application forms which describe in detail all equipment that is requested to be included in the PTC permit.

2.0 REGULATORY APPLICABILITY

A review of state and local air quality regulations has been conducted and each regulation is described in the following sections. Included in Appendix C is the completed federal regulatory applicability PTC form.

2.1 National Ambient Air Quality Standards (NAAQS)

Primary National Ambient Air Quality Standards (NAAQS) are identified in 40 CFR Part 50 and define levels of air quality, which the United States Environmental Protection Agency (USEPA) deems necessary to protect the public health. Secondary NAAQS define levels of air quality, which the USEPA judges necessary to protect public welfare from any known, or anticipated adverse effects of a pollutant. Examples of public welfare include protecting wildlife, buildings, national monuments, vegetation, visibility, and property values from degradation due to excessive emissions of criteria pollutants.

Specific standards for the following pollutants have been promulgated by USEPA: PM₁₀, SO₂, NO_x, CO, ozone, and lead. The Frazier facility emits PM₁₀, and VOCs, a precursor to ozone. The facility is a minor source with respect to PSD and Title V as it will not exceed any major source thresholds.

2.2 National Emission Standards for Hazardous Air Pollutants (NESHAPs)

Two sets of National Emissions Standards for Hazardous Air Pollutants (NESHAPs) may potentially apply to the Frazier facility. The first NESHAP regulations were developed under the auspices of the original CAA. These standards are codified in 40 CFR Part 61, and address a limited number of pollutants and industries. 40 CFR Part 61 regulations do not apply to this planned facility.

Newer regulations are codified in 40 CFR Part 63 under the authority of the 1990 Clean Air Act Amendments (CAAA). These standards regulate HAP emissions from specific source categories and typically affect only major sources of HAPs. Part 63 regulations are frequently called Maximum Achievable Control Technology (MACT) standards. Major HAP sources have the PTE 10 tpy or more of any single HAP or 25 tpy or more of all combined HAP emissions. It was determined per NOV Case No. E-070016 that as of December 31, 2003 Frazier became a major source for Hazardous Air Pollutants (HAPs). Based on past Potential to Emit (PTE) levels Frazier is subject to the provisions of 40 CFR 63 Subpart M-MMM-National Emission Standards for Surface Coating of Miscellaneous Metal parts and Products. Although Frazier was a major source of HAPs as of 2003, the current PTE is less than major source levels. Since 2003 Frazier has changed several of their coatings to low-HAP equivalent coatings. The HAPs emitted from this facility include xylene, toluene, ethyl benzene and cumene.

2.2.1 40 CFR Part 63, Subpart MMMM

Surface Coating of Miscellaneous Metal Parts and Products– Options and Requirements

Background/Applicability

Subpart MMMM establishes NESHAP for surface coating of miscellaneous metal parts and products. The following citations are the criteria for determining applicability:

§63.3881 (a) Miscellaneous metal parts and products include, but are not limited to, metal components of the following types of products as well as the products themselves: motor vehicle parts and accessories, bicycles and sporting goods, recreational vehicles, extruded aluminum structural components, railroad cars, heavy duty trucks, medical equipment, lawn and garden equipment, electronic equipment, magnet wire, steel drums, industrial machinery, metal pipes, and numerous other industrial, household, and consumer products.

§63.3881 (b), you are subject to this subpart if you own or operate a new, reconstructed, or existing affected source that uses 250 gallons per year or more, of coatings that contain hazardous air pollutants (HAP) in the source category defined in paragraph §63.3881 (a) and that is a major source, is located at a major source, or is part of a major source of emissions of HAPs.

Although Frazier currently is not a major source for HAPs, it had the potential to emit greater than 10 tons of xylene for the years 2003 to 2006. Beginning in 2007 Frazier has reduced xylene emission to less than 10 tpy. The Idaho DEQ informed Frazier that the MACT “once in, always in” provision applies, even though the initial compliance period and future xylene emissions are less than 10 tpy. The emission sources at Frazier’s Pocatello facility which are subject to this subpart are three dip tanks which are used to coat steel parts and products.

Options & Requirements

EPA has designed three options for demonstrating compliance with Subpart MMMM. Any of the compliance options may be applied to an individual coating operation or to multiple coating operations as a group or to the entire facility. All three compliance options have the same HAP emission limit of 2.6 lb HAP/gal Solid. The three compliance options are as follows:

- Compliant Material Option
- Emission Rate Without Add-On Controls Option
- Emission Rate With Add-On Controls Option

Frazier has chosen Option 2- emission rate without add-on controls to demonstrate compliance.

Emission Rate Without Add-On Controls Option

To demonstrate initial compliance using the emission rate without add-on control option, Frazier's facility-wide coating operations or group of coating operations must meet the applicable emission limit of 2.6 lb HAP/gal solid.

This option is based on the HAP emissions of all the coating and materials used at the facility. Frazier's existing coatings have been calculated for HAP content and it was determined that the Blue and Orange paints meet the individual HAPs limit. However, the Univar Aromatic 100 solvent and Yellow paint exceed the individual HAPs limit of 2.6 lb HAP/gal solids. The emission rate without add-on control option calculates the emission rate as a rolling 12-month rate determined on a monthly basis. The emission rate is calculated based on Frazier's combined coating materials, i.e. an average.

On February 29, 2008 Frazier submitted an initial compliance demonstration report to EPA and IDEQ documenting their compliance with the HAPs limit. Frazier is currently in compliance with this HAP limit and will demonstrate continuous compliance according to the requirements outlined in Section 2.9 through 2.13 of their current permit P-2008.0084.

2.3 State Rules

The Idaho Administrative Procedure Act (IDAPA) promulgates several emissions regulations that apply to Frazier in addition to those listed above.

2.3.1 NAAQS

IDAPA 58.01.01.203.02 establishes requirements for compliance with the NAAQS. According to the IDEQ Air Quality Modeling Guideline the modeling threshold, below which modeling is generally not required is 1.0 ton/yr for PM-10 emissions. Frazier believes that because the emission rate is below the modeling threshold and since the emissions are confined to the interior of the building the emissions will not significantly contribute to violating the NAAQS standard for PM-10.

2.3.2 Toxic Air Pollutants

IDAPA 58.01.01.585 and 586 establishes requirements for compliance with toxic air pollutants. IDAPA 58.01.01.585 and 586 establishes emission levels (ELs) for TAP increases, below which modeling is not required. Table 2-1 below documents the increase in each individual TAP resulting from this permitting action. The increase in each TAP is below the associated EL which demonstrates Frazier's compliance with the toxic air pollutant standards.

Table 2-1 TAPs Increase

Pollutant	Total (lb/hr)	Currently Permitted (lb/hr)	Increase (lb/hr)	Screening Level (lb/hr)	Modeling? (Y/N)
n-Butyl Alcohol	2.92	1.57	1.35	10	No
Xylene	3.61	0.84	2.77	29	No
Ethyl Benzene	0.83	0.37	0.46	29	No
Stoddard	2.75	2.75	0	35	No
Toluene	2.06	2.06	0	25	No
Cumene	0.30	0.30	0	16.3	No
Iron	0.02	0.02	0	0.333	No
Manganese	0.002	0.002	0	0.067	No
Copper	0.0001	0.0001	0	0.013	No
Trimethyl Benzene	8.92	9.41	-0.49	8.2	No
Methyl-Isoketone	0.67	0	0.67	13.7	No
Methyl Acetate	0.33	0	0.33	40.7	No

3.0 EMISSION SUMMARY

A summary of the potential emissions for the facility is presented in Table 3-1. Emission calculations have been completed for: PM₁₀, VOCs and both individual and combined hazardous air pollutants. Detailed emission calculations are included in Appendix A. Permit application forms are included as Appendix C.

Table 3-1. Frazier Industrial Company PTE

	PM₁₀ (tpy)	VOC (tpy)	Individual HAP (tpy)	Combined HAP (tpy)
Proposed	0.39	99.13	6.0	10.25
Currently Permitted	0.39	88.67	2.06	4.35
Increase	0	10.46	3.94	5.99

APPENDIX A

EMISSION CALCULATIONS

FRAZIER INDUSTRIAL COMPANY PTE SUMMARY

Source	Paint	Pollutant				
		PM-10		VOC		HAPs
		lb/hr	ton/yr	lb/hr	ton/yr	lb/hr
Dip Tank 1 ^a	Orange + Solvent			8.78	26.54	0.42
Dip Tank 2 ^b	Orange + Solvent or Yellow + Solvent (new or old yellow)			9.93	33.65	4.94
Dip Tank 3	Blue + Solvent			12.42	38.93	0.42
Welding	-	0.09	0.39			
TOTAL		0.09	0.39	31.13	99.13	5.78
						10.25

^a Solvent is used in all three tanks. Assumed total solvent emissions are divided equally between the three tanks.

^b Yellow paint is occasionally used in Tank #2. Worst case total hourly emissions assumes Trin-Kote yellow + solvent being used in Tank #2. Worst case annual tpy assumes orange and Sheyboygan yellow + solvent being used in Tank #2.

Source	TAPs										
	n-Butyl Alcohol	Xylene	Eth Benz	Stoddard	Toluene	Cumene	Iron	Mang	Copper	Trimethyl Benzene	Methyl Acetate
	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr
Dip Tank 1	0.78	0.23	0.05	na	na	na	na	na	na	1.43	na
Dip Tank 2	0.78	0.23	0.05	na	na	na	na	na	na	1.43	na
Dip Tank 3	1.37	na	0.02	na	na	na	na	na	na	2.57	na
Yellow	na	2.90	0.71	2.75	2.06	0.14	na	na	na	1.10	0.33
Solvent	na	0.24	na	na	na	0.16	na	na	na	3.50	na
Welding	na	na	na	na	na	na	0.02	2.0E-03	1.1E-04	na	na
TOTAL^c	2.92	3.61	0.83	2.75	2.06	0.30	0.02	0.002	0.0001	8.92	0.33
Currently Permitted	1.57	0.84	0.37	2.75	2.06	0.30	0.02	0.002	0.0001	9.41	0.00
Increase (lb/hr)	1.35	2.77	0.46	0.00	0.00	0.00	0.00	0.00	0.00	-0.49	0.33
EL (lb/hr)	10	29	29	35	25	16.3	0.333	0.067	0.013	8.2	40.7
EL Exceeded (Y/N)	No	No	No	No	No	No	No	No	No	No	No

^c Yellow paint is used in one of the three tanks. Worst case total max trimethyl benzene assumes Dip Tank 1, 2, and 3 with blue and orange paint and yellow not operating.

DIP TANK 1
POTENTIAL TO EMIT
VOC and HAP

Max VOC Coating: New Fast Dry Orange- High Solids
Coating ID: 43-62154B
Density (lb/gal): 10.36
Potential Gallons Mixture Applied (gal/yr)^b: 9,500
Max Potential Gallons (gal/hr): 1.60

Volatile Component	CAS No.	Max Wt. Fraction	VOC Emissions (lb/hr)	VOC Emissions (T/yr)	HAP Emissions (lb/hr)	HAP Emissions (T/yr)	TAP Emissions (lb/hr)
1,2,4-Trimethylbenzene	95-63-6	0.086	1.43	4.24	na	na	1.43
n-Butyl Alcohol	71-36-3	0.047	0.78	2.30	na	na	0.78
Xylene (mixed isomers)	1330-20-7	0.0140	0.23	0.69	0.232	0.69	0.23
Ethyl Benzene	100-41-4	0.003	0.05	0.15	0.050	0.15	0.05
Other VOCs	108-67-8	0.1622	2.69	7.98	na	na	na
TOTAL^a			5.17	15.36	0.28	0.84	2.48

^aOnly non-exempt VOC, HAP and TAP components are summed.

^bTotal Orange Paint Usage is 21,000 gal/yr and is divided between Tanks #1 and #2

DIP TANK 2
POTENTIAL TO EMIT
VOC and HAP

Max VOC Coating: New Fast Dry Orange- High Solids
Coating ID: 43-62154B
Density (lb/gal): 10.36
Potential Gallons Mixture Applied (gal/yr)^b: 9,500
Max Potential Gallons (gal/hr): 1.6

Volatile Component	CAS No.	Max Wt. Fraction	VOC Emissions (lb/hr)	VOC Emissions (T/yr)	HAP Emissions (lb/hr)	HAP Emissions (T/yr)	TAP Emissions (lb/hr)
1,2,4-Trimethylbenzene	95-63-6	0.086	1.43	4.24	na	na	1.43
n-Butyl Alcohol	71-36-3	0.047	0.78	2.30	na	na	0.78
Xylene (mixed isomers)	1330-20-7	0.014	0.23	0.69	0.23	0.69	0.23
Ethyl Benzene	100-41-4	0.003	0.05	0.15	0.05	0.15	0.05
Other VOCs	108-67-8	0.162	2.69	7.98	na	na	na
TOTAL^a		0.3121	5.17	15.36	0.28	0.84	2.48

^aOnly non-exempt VOC, HAP and TAP components are summed.

^bTotal Orange Paint Usage is 21,000 gal/yr and is divided between Tanks #1 and #2

DIP TANK 3
POTENTIAL TO EMIT
VOC and HAP

Max VOC Coating: New FD Blue- HS Dip
 Coating ID: 43-41491B
 Density (lb/gal): 10.33
 Potential Gallons Mixture Applied (gal/yr): 17,000
 Max Potential Gallons (gal/hr): 2.70

Volatile Component	CAS No.	Max Wt. Fraction	VOC Emissions (lb/hr)	VOC Emissions (T/yr)	HAP Emissions (lb/hr)	HAP Emissions (T/yr)	TAP Emissions (lb/hr)
1,2,4-Trimethylbenzene	95-63-6	0.0920	2.57	8.08	na	na	2.57
n-Butyl Alcohol	71-36-3	0.049	1.37	4.31	na	na	1.37
Ethylbenzene	100-41-4	0.001	0.02	0.07	0.022	0.07	0.02
Unspecified HAP		0.010	0.27	0.84	0.268	0.84	0.27
Other VOCs ^b		0.165	4.59	14.44	na	na	na
TOTAL^a			8.81	27.75	0.29	0.91	4.23

^aOnly non-exempt VOC, HAP and TAP components are summed.

^bTotal volatile wt% from MSDS sheet=31.67

**YELLOW PAINT
POTENTIAL TO EMIT
VOC and HAP**

Max VOC Coating: Trin-Kote MDI Yellow H/S Enamel
Coating ID: EH5182
Density (lb/gal): 9.16
Potential Gallons Mixture Applied (gal/yr): 2,310
Max Potential Gallons (gal/hr): 1.50

Volatile Component	CAS No.	Max Wt. Fraction	VOC Emissions (lb/hr)	VOC Emissions (T/yr)	HAP Emissions (lb/hr)	HAP Emissions (T/yr)	TAP Emissions (lb/hr)
Mineral Spirits (Stoddard)	8052-41-3	0.200	2.75	2.12	na	na	2.75
Toluene	108-88-3	0.150	2.06	1.59	2.06	1.59	2.06
1,2,4-Trimethylbenzene	95-63-6	0.050	0.69	0.53	na	na	0.69
1,3,5-Trimethylbenzene	108-67-8	0.030	0.41	0.32	na	na	0.41
Cumene	98-82-8	0.010	0.14	0.11	0.137	0.11	0.14
Ethyl Benzene	100-41-4	0.010	0.14	0.11	0.137	0.11	0.14
Xylene	1330-20-7	0.010	0.14	0.11	0.137	0.11	0.14
TOTAL^a			6.32	4.87	2.47	1.90	6.32

^aOnly non-exempt VOC, HAP and TAP components are summed.
Yellow paint is used occasionally throughout the year and usually in Dip Tank #2

**YELLOW PAINT
POTENTIAL TO EMIT
VOC and HAP**

Max VOC Coating:
Coating ID: MDI Yellow Quick Dry Hi-Solids
Density (lb/gal): Sheyboygan 43-62069
Potential Gallons Mixture Applied (gal/yr): 10.13
Max Potential Gallons (gal/hr): 4,000
1.50

Volatile Component	CAS No.	Max Wt. Fraction	VOC Emissions (lb/hr)	VOC Emissions (T/yr)	HAP Emissions (lb/hr)	HAP Emissions (T/yr)	TAP Emissions (lb/hr)
Methyl Acetate	79-20-9	0.022	0.33	0.44	na	na	0.33
Toluene	108-88-3	0.035	0.53	0.70	0.53	0.70	0.53
Methyl Isobutyl Ketone	108-10-1	0.044	0.67	0.89	0.669	0.89	0.67
Ethyl Benzene	100-41-4	0.047	0.71	0.94	0.708	0.94	0.71
Xylene	1330-20-7	0.191	2.90	3.87	2.902	3.87	2.90
Unspecified VOC		0.013	0.20	0.26	na	na	na
TOTAL^a			5.33	7.11	4.80	6.41	5.14

^aOnly non-exempt VOC, HAP and TAP components are summed.
Yellow paint is only used once or twice a year and usually in Dip Tank #2

**SOLVENT MIXED IN TANKS
POTENTIAL TO EMIT
VOC and HAP**

Max VOC Coating: Aromatic 100 Fluid
 Coating ID: EQ940652
 Density (lb/gal): 7.29
 Potential Gallons Mixture Applied (gal/yr): 9,300
 Potential Gallons (gal/hr): 1.50

Volatile Component	CAS No.	Max Wt. Fraction	VOC Emissions (lb/hr)	VOC Emissions (T/yr)	HAP Emissions (lb/hr)	HAP Emissions (T/yr)	TAP Emissions (lb/hr)
1,2,4-Trimethylbenzene	95-63-6	0.320	3.50	10.85	na	na	3.50
Cumene	98-82-8	0.015	0.16	0.51	0.164	0.51	0.16
Xylene	1330-20-7	0.022	0.24	0.75	0.241	0.75	0.24
Other VOCs	108-67-8	0.633	6.92	21.46	na	na	na
TOTAL^a			10.83	33.56	0.40	1.25	3.90

^aOnly non-exempt VOC, HAP and TAP components are summed.

Carbon Steel Electrode

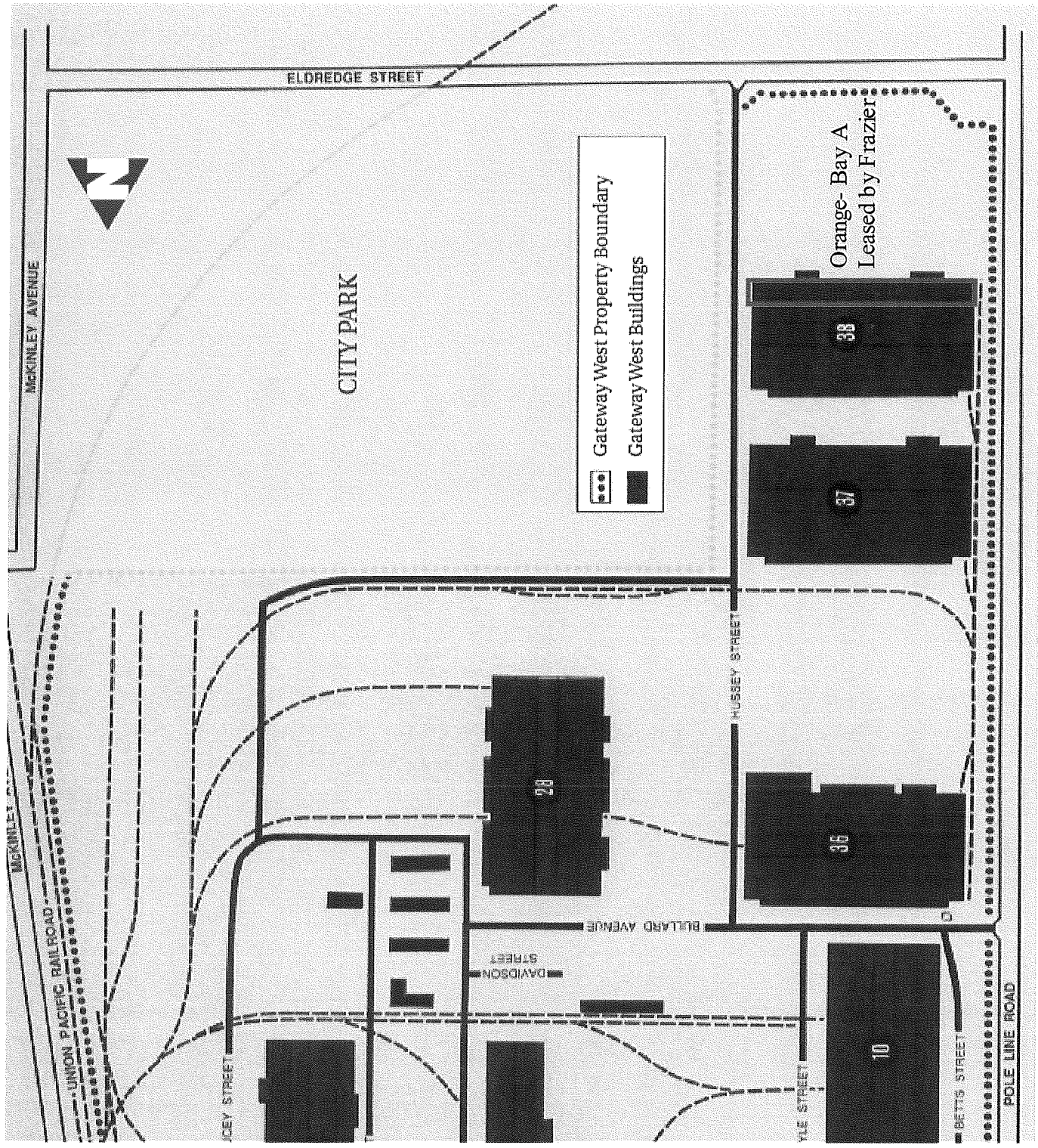
Welding Wire Usage= 200,000 lb/yr
 Welding Wire Usage= 34.34 lb/hr
 PM Emission Factor= 0.0026 lb PM/lb electrode
 Fume Emission Factor= 0.22 g/min

Component	CAS No.	Fume Chemistry	PM-10 Emissions ^a (lb/hr)	TAP Emissions (lb/hr)
Iron	7439-89-6	55%	0.089	0.016
Manganese	7439-96-5	6.9%	6.16E-06	0.002
Copper	7440-50-8	0.39%	3.48E-07	0.00011
TOTAL			0.089	0.391

Manufacturer's Information/ MSDS

^a Assume all particulate emissions are PM-10

APPENDIX B
SCALED PLOT PLAN



Hussey Street

300 ft

Stack #1

Horiz.
Vent

Stack #2

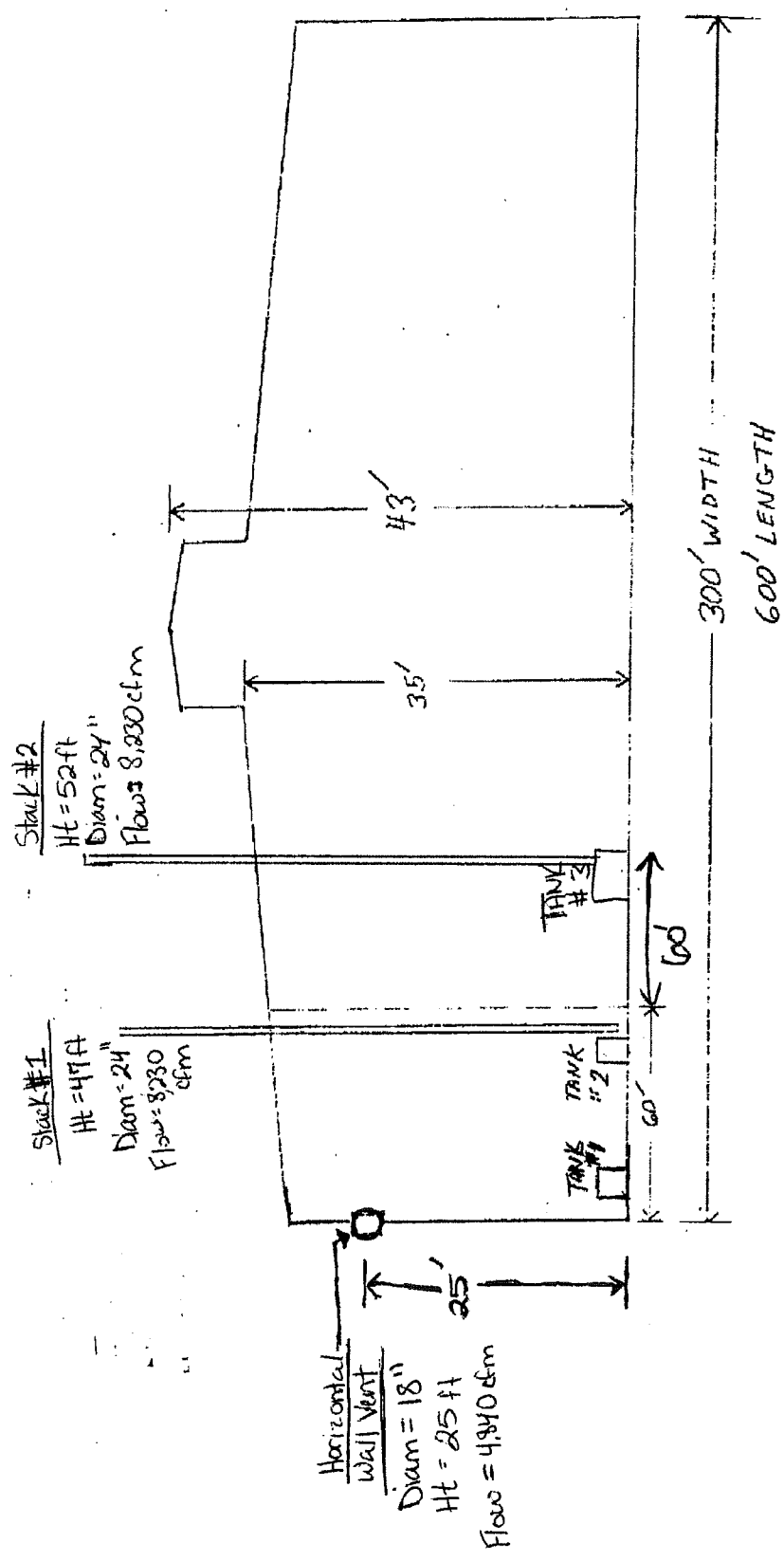
38

600 ft

Orange- Bay A
Leased by Frazier

Poleline Road

37



APPENDIX C
PTC APPLICATION FORMS

PERMIT TO CONSTRUCT APPLICATION

Revision 1
01/11/07

COMPANY NAME, FACILITY NAME, AND FACILITY ID NUMBER			
1. Company Name		Frazier Industrial Company	
2. Facility Name		Pocatello	3. Facility ID No. 005-00057
4. Brief Project Description - One sentence or less		Manufacturer of Structural Steel Storage Systems	
PERMIT APPLICATION TYPE			
5. <input type="checkbox"/> New Facility <input type="checkbox"/> New Source at Existing Facility <input type="checkbox"/> Unpermitted Existing Source <input checked="" type="checkbox"/> Modify Existing Source: Permit No.: P-2008.0084 Date Issued: 3/7/08 <input type="checkbox"/> Required by Enforcement Action: Case No.			
6. <input checked="" type="checkbox"/> Minor PTC <input type="checkbox"/> Major PTC			
FORMS INCLUDED			
Included	N/A	Forms	DEQ Verify
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Form GI – Facility Information	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Form EU0 – Emissions Units General <u> 4 </u>	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form EU1 - Industrial Engine Information Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form EU2 - Nonmetallic Mineral Processing Plants Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form EU3 - Spray Paint Booth Information Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form EU4 - Cooling Tower Information Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form EU5 – Boiler Information Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form HMAP – Hot Mix Asphalt Plant Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form CBP - Concrete Batch Plant Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form BCE - Baghouses Control Equipment	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form SCE - Scrubbers Control Equipment	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Forms EI-CP1 - EI-CP4 - Emissions Inventory– criteria pollutants (Excel workbook, all 4 worksheets)	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	PP – Plot Plan	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Forms MI1 – MI4 – Modeling (Excel workbook, all 4 worksheets)	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Form FRA – Federal Regulation Applicability	<input type="checkbox"/>

DEQ USE ONLY
Date Received
Project Number
Payment / Fees Included? Yes <input type="checkbox"/> No <input type="checkbox"/>
Check Number



DEQ AIR QUALITY PROGRAM
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Air Permit Hotline – 877-5PERMIT

PERMIT TO CONSTRUCT APPLICATION

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Please see instructions on page before filling out the form.

All information is required. If information is missing, the application will not be processed.

IDENTIFICATION

1. Company Name	Frazier Industrial Company
2. Facility Name (if different than #1)	Pocatello
3. Facility I.D. No.	005-00057
4. Brief Project Description:	Manufacturer of Structural Steel Storage Systems

Facility Information

5. Owned/operated by: (✓ if applicable)	<input type="checkbox"/> Federal government <input type="checkbox"/> County government <input type="checkbox"/> State government <input type="checkbox"/> City government
6. Primary Facility Permit Contact Person/Title	Richard Peake, Industrial Engineer
7. Telephone Number and Email Address	(843) 326-1477 ext 106 rpeake@frazier.com
8. Alternate Facility Contact Person/Title	Dwayne Catoe, Manufacturing Engineer Manager
9. Telephone Number and Email Address	(843) 326-1477 dcatoe@frazier.com
10. Address to which permit should be sent	3770 Poleline Road, Bldg 38
11. City/State/Zip	Pocatello, ID 83201
12. Equipment Location Address (if different than #9)	
13. City/State/Zip	
14. Is the Equipment Portable?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
15. SIC Code(s) and NAISC Code	Primary SIC: 2542 Secondary SIC (if any): NAICS: 337215
16. Brief Business Description and Principal Product	Manufacturer of Structural Steel Storage Systems
17. Identify any adjacent or contiguous facility that this company owns and/or operates	

PERMIT APPLICATION TYPE

18. Specify Reason for Application	<input type="checkbox"/> New Facility	<input type="checkbox"/> New Source at Existing Facility
	<input checked="" type="checkbox"/> Modify Existing Source: Permit No.: <u>P-2008-0084</u> Date Issued: <u>3/7/08</u>	
	<input type="checkbox"/> Unpermitted Existing Source:	
	<input type="checkbox"/> Required by Enforcement Action: Case No.: _____	

CERTIFICATION

IN ACCORDANCE WITH IDAPA 58.01.01.123 (RULES FOR THE CONTROL OF AIR POLLUTION IN IDAHO), I CERTIFY BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION IN THE DOCUMENT ARE TRUE, ACCURATE, AND COMPLETE.

19. Responsible Official's Name/Title	Richard Peake	
20. RESPONSIBLE OFFICIAL SIGNATURE		Date: <u>7-17-08</u>
21. <input checked="" type="checkbox"/> Check here to indicate you would like to review a draft permit prior to final issuance.		



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IDENTIFICATION

Company Name: Frazier Industrial Company	Facility Name: Pocatello	Facility ID No: 005-00057
Brief Project Description:		Manufacturer of Structural Steel Storage Systems

EMISSIONS UNIT (PROCESS) IDENTIFICATION & DESCRIPTION

1. Emissions Unit (EU) Name:	DIP TANK #1		
2. EU ID Number:	T01		
3. EU Type:	<input type="checkbox"/> New Source <input type="checkbox"/> Unpermitted Existing Source <input checked="" type="checkbox"/> Modification to a Permitted Source -- Previous Permit #: <u>P-2008.0084</u> Date Issued: 3/07/08		
4. Manufacturer:	Internally Fabricated		
5. Model:	Internally Fabricated		
6. Maximum Capacity:	1,300 GALLONS		
7. Date of Construction:	MARCH 1996		
8. Date of Modification (if any)			
9. Is this a Controlled Emission Unit?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If Yes, Complete the following section. If No, go to line 18.		

EMISSIONS CONTROL EQUIPMENT

10. Control Equipment Name and ID:						
11. Date of Installation:		12. Date of Modification (if any):				
13. Manufacturer and Model Number:						
14. ID(s) of Emission Unit Controlled:						
15. Is operating schedule different than emission units(s) involved?:	<input type="checkbox"/> Yes <input type="checkbox"/> No					
16. Does the manufacturer guarantee the control efficiency of the control equipment?	<input type="checkbox"/> Yes <input type="checkbox"/> No (If yes, attach and label manufacturer guarantee)					
	Pollutant Controlled					
	PM	PM10	SO ₂	NO _x	VOC	CO
Control Efficiency						

17. If manufacturer's data is not available, attach a separate sheet of paper to provide the control equipment design specifications and performance data to support the above mentioned control efficiency.

EMISSION UNIT OPERATING SCHEDULE (hours/day, hours/year, or other)

18. Actual Operation	6,240 HR/YR
19. Maximum Operation	8,760 HR/YR

REQUESTED LIMITS

20. Are you requesting any permit limits?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If Yes, check all that apply below)
<input type="checkbox"/> Operation Hour Limit(s):	
<input type="checkbox"/> Production Limit(s):	
<input checked="" type="checkbox"/> Material Usage Limit(s):	19,000 GAL/YR TOTAL ORANGE PAINT and 2,310 GALLONS OF EXISTING TRINKOTE YELLOW OR 4,000 GAL/YR SHEBOYGAN YELLOW BETWEEN TANKS #1 AND #2 FACILITY WIDE 9,300 GAL/YR AROMATIC
<input type="checkbox"/> Limits Based on Stack Testing	
<input type="checkbox"/> Other:	
21. Rationale for Requesting the Limit(s):	MAXIMUM PROJECTED PAINT AND SOLVENT USAGE



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IDENTIFICATION

Company Name: Frazier Industrial Company	Facility Name: Pocatello	Facility ID No: 005-00057
Brief Project Description:		Manufacturer of Structural Steel Storage Systems

EMISSIONS UNIT (PROCESS) IDENTIFICATION & DESCRIPTION

1. Emissions Unit (EU) Name:	DIP TANK #2		
2. EU ID Number:	T02		
3. EU Type:	<input type="checkbox"/> New Source <input type="checkbox"/> Unpermitted Existing Source <input checked="" type="checkbox"/> Modification to a Permitted Source -- Previous Permit #: <u>P-2008.0084</u> Date Issued: 3/07/08		
4. Manufacturer:	Internally Fabricated		
5. Model:	Internally Fabricated		
6. Maximum Capacity:	1,650 GALLONS		
7. Date of Construction:	MARCH 1996		
8. Date of Modification (if any)			
9. Is this a Controlled Emission Unit?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If Yes, Complete the following section. If No, go to line 18.		

EMISSIONS CONTROL EQUIPMENT

10. Control Equipment Name and ID:						
11. Date of Installation:		12. Date of Modification (if any):				
13. Manufacturer and Model Number:						
14. ID(s) of Emission Unit Controlled:						
15. Is operating schedule different than emission units(s) involved?:	<input type="checkbox"/> Yes <input type="checkbox"/> No					
16. Does the manufacturer guarantee the control efficiency of the control equipment?	<input type="checkbox"/> Yes <input type="checkbox"/> No (If yes, attach and label manufacturer guarantee)					
	Pollutant Controlled					
	PM	PM10	SO ₂	NOx	VOC	CO
Control Efficiency						

17. If manufacturer's data is not available, attach a separate sheet of paper to provide the control equipment design specifications and performance data to support the above mentioned control efficiency.

EMISSION UNIT OPERATING SCHEDULE (hours/day, hours/year, or other)

18. Actual Operation	6,240 HR/YR
19. Maximum Operation	8,760 HR/YR

REQUESTED LIMITS

20. Are you requesting any permit limits?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If Yes, check all that apply below)
<input type="checkbox"/> Operation Hour Limit(s):	
<input type="checkbox"/> Production Limit(s):	
<input checked="" type="checkbox"/> Material Usage Limit(s):	19,000 GAL/YR TOTAL ORANGE PAINT and 2,310 GALLONS OF EXISTING TRINKOTE YELLOW OR 4,000 GAL/YR SHEBOYGAN YELLOW BETWEEN TANKS #1 AND #2 FACILITY WIDE 9,300 GAL/YR AROMATIC.
<input type="checkbox"/> Limits Based on Stack Testing	
<input type="checkbox"/> Other:	
21. Rationale for Requesting the Limit(s):	MAXIMUM PROJECTED PAINT AND SOLVENT USAGE



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IDENTIFICATION

Company Name: Frazier Industrial Company	Facility Name: Pocatello	Facility ID No: 005-00057
Brief Project Description:	Manufacturer of Structural Steel Storage Systems	

EMISSIONS UNIT (PROCESS) IDENTIFICATION & DESCRIPTION

1. Emissions Unit (EU) Name:	DIP TANK #3		
2. EU ID Number:	T03		
3. EU Type:	<input type="checkbox"/> New Source <input type="checkbox"/> Unpermitted Existing Source <input checked="" type="checkbox"/> Modification to a Permitted Source -- Previous Permit #: <u>P-2008.0084</u> Date Issued: 3/07/08		
4. Manufacturer:	Internally Fabricated		
5. Model:	Internally Fabricated		
6. Maximum Capacity:	4,800 GALLONS		
7. Date of Construction:	2004		
8. Date of Modification (if any)			
9. Is this a Controlled Emission Unit?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If Yes, Complete the following section. If No, go to line 18.		

EMISSIONS CONTROL EQUIPMENT

10. Control Equipment Name and ID:						
11. Date of Installation:		12. Date of Modification (if any):				
13. Manufacturer and Model Number:						
14. ID(s) of Emission Unit Controlled:						
15. Is operating schedule different than emission units(s) involved?:	<input type="checkbox"/> Yes <input type="checkbox"/> No					
16. Does the manufacturer guarantee the control efficiency of the control equipment?	<input type="checkbox"/> Yes <input type="checkbox"/> No (If yes, attach and label manufacturer guarantee)					
	Pollutant Controlled					
Control Efficiency	PM	PM10	SO ₂	NO _x	VOC	CO

17. If manufacturer's data is not available, attach a separate sheet of paper to provide the control equipment design specifications and performance data to support the above mentioned control efficiency.

EMISSION UNIT OPERATING SCHEDULE (hours/day, hours/year, or other)

18. Actual Operation	6,240 HR/YR
19. Maximum Operation	8,760 HR/YR

REQUESTED LIMITS

20. Are you requesting any permit limits?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If Yes, check all that apply below)
<input type="checkbox"/> Operation Hour Limit(s):	
<input type="checkbox"/> Production Limit(s):	
<input checked="" type="checkbox"/> Material Usage Limit(s):	17,000 GAL/YR BLUE PAINT AND FACILITY WIDE 9,300 GAL/YR AROMATIC
<input type="checkbox"/> Limits Based on Stack Testing	
<input type="checkbox"/> Other:	
21. Rationale for Requesting the Limit(s):	MAXIMUM PROJECTED PAINT AND SOLVENT USAGE



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IDENTIFICATION

Company Name: Frazier Industrial Company	Facility Name: Pocatello	Facility ID No: 005-00057
Brief Project Description:	Manufacturer of Structural Steel Storage Systems	

EMISSIONS UNIT (PROCESS) IDENTIFICATION & DESCRIPTION

1. Emissions Unit (EU) Name:	STEEL WELDING		
2. EU ID Number:	W01		
3. EU Type:	<input type="checkbox"/> New Source <input type="checkbox"/> Unpermitted Existing Source <input type="checkbox"/> Modification to a Permitted Source -- Previous Permit #: <u>P-2008.0084</u> Date Issued: 3/7/08		
4. Manufacturer:			
5. Model:	L-50 CARBON STEEL ELECTRODE		
6. Maximum Capacity:	200,000 LB/YR WELDING ELECTRODE		
7. Date of Construction:	MARCH 1996		
8. Date of Modification (if any)			
9. Is this a Controlled Unit?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If Yes, Complete the following section. If No, go to line 18.		

EMISSIONS CONTROL EQUIPMENT

10. Control Equipment Name and ID:						
11. Date of Installation:		12. Date of Modification (if any):				
13. Manufacturer and Model Number:						
14. ID(s) of Emission Unit Controlled:						
15. Is operating schedule different than emission units(s) involved?:	<input type="checkbox"/> Yes <input type="checkbox"/> No					
16. Does the manufacturer guarantee the control efficiency of the control equipment?	<input type="checkbox"/> Yes <input type="checkbox"/> No (If yes, attach and label manufacturer guarantee)					
	Pollutant Controlled					
	PM	PM10	SO ₂	NO _x	VOC	CO
Control Efficiency						

17. If manufacturer's data is not available, attach a separate sheet of paper to provide the control equipment design specifications and performance data to support the above mentioned control efficiency.

EMISSION UNIT OPERATING SCHEDULE (hours/day, hours/year, or other)

18. Actual Operation	6,240 HR/YR
19. Maximum Operation	8,760 HR/YR

REQUESTED LIMITS

20. Are you requesting any permit limits?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If Yes, check all that apply below)
<input type="checkbox"/> Operation Hour Limit(s):	
<input type="checkbox"/> Production Limit(s):	
<input checked="" type="checkbox"/> Material Usage Limit(s):	200,000 LB/YR WIRE ELECTRODE
<input type="checkbox"/> Limits Based on Stack Testing	
<input type="checkbox"/> Other:	
21. Rationale for Requesting the Limit(s):	MAXIMUM PROJECTED USAGE



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IDENTIFICATION		
Company Name: Frazier Industrial Company	Facility Name: Pocatello	Facility ID No: 005-00057
Brief Project Description: Manufacturer of Structural Steel Storage Systems		
APPLICABILITY DETERMINATION		
Will this project be subject to 1990 CAA Section 112(g)? (Case-by-Case MACT)	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES* * If YES then applicant must submit an application for a case-by-case MACT determination [IAC 567 22-1(3)"b" (8)]	
Will this project be subject to a New Source Performance Standard? (40 CFR part 60)	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES* *If YES please identify sub-part:	
Will this project be subject to a MACT (<u>M</u> aximum <u>A</u> chievable <u>C</u> ontrol <u>T</u> echnology) regulation? (40 CFR part 63)	<input type="checkbox"/> NO <input checked="" type="checkbox"/> YES* *If YES please identify sub-part: <u>MMMM</u>	
THIS ONLY APPLIES IF THE PROJECT EMITS A HAZARDOUS AIR POLLUTANT		
Will this project be subject to a NESHAP (<u>N</u> ational <u>E</u> mission <u>S</u> tandards for <u>H</u> azardous <u>A</u> ir <u>P</u> ollutants) regulation? (40 CFR part 61)	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES* *If YES please identify sub-part: _____	
Will this project be subject to PSD (<u>P</u> revention of <u>S</u> ignificant <u>D</u> eterioration)? (40 CFR section 52.21)	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	
Was netting done for this project to avoid PSD?	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES* *If YES please attach netting calculations	
If you are unsure how to answer any of these questions call the Air Permit Hotline at 877-5PERMIT		

[illegible]

APPENDIX D

MSDS